

THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO.: 2:23-cv-01495-JHC

**STIPULATED MOTION AND
[PROPOSED] ORDER
EXTENDING DEADLINES**

**NOTE ON MOTION CALENDAR:
October 28, 2024**

The Court's October 18, 2024 Order Extending Interim Deadlines (Dkt. #310) provides that the deadline for Plaintiffs to file a motion regarding any disputes regarding search is October 30, 2024, and that the parties will file a joint submission on proposed deadlines for any Second Set of documents by November 4, 2024.

The parties have continued to meet and confer regarding search issues. The parties agree that a brief extension of the above-referenced deadlines may allow the parties to further narrow their disputes and reduce the number of issues that will require court intervention. Accordingly, the parties, by and through their respective attorneys of record, hereby stipulate and agree to the following deadlines:

1 1. The deadline for Plaintiffs to file a motion regarding any disputes regarding
2 search, including custodians or search terms, shall be November 5, 2024.

3 a. This deadline does not apply to any disputes regarding non-custodial
4 sources or Amazon’s proposed “spam” protocol for custodians Andy Jassy
5 and Jeff Bezos. Any motions regarding those issues are due no later than
6 November 14, 2024. (Dkt. #319).

7 b. The Court’s Order regarding sealing issues shall apply separately to any
8 discovery motions, including oppositions or replies related to such
9 motions, filed on or before November 5, 2024, and to any discovery
10 motions, including oppositions or replies related to such motions, filed on
11 or before November 14, 2024. (Dkt. #320).

12 2. The deadline for a joint submission on proposed deadlines for any Second Set of
13 documents shall be November 12, 2024.

1 Stipulated to and respectfully submitted this 28th day of October, 2024, by:

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

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